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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Cleopatria Martinez,

Plaintiff,

v.

Maricopa County Community College
District; et al.,

Defendants.

No. CV 15-01759-PHX-NVW

**MOTION TO FILE DEFENDANTS’
TASK-BASED ITEMIZED
STATEMENT OF FEES AND
EXPENSES AND FEE
AGREEMENT UNDER SEAL**

Defendants Maricopa County Community College District, Rufus Glasper, Ph.D. and Debra Glasper (“Defendants”), by and through their undersigned counsel, respectfully request leave of the Court to file their Task-Based Itemized Statement of Fees and Expenses (“Itemized Statement”) and Fee Agreement in support of Defendants’ Motion for Attorneys’ Fees and Costs (Doc. 95) under seal.

Local Rule 54.2(d)(3) provides that “Counsel may seek leave of Court to file such statement under seal if deemed necessary to prevent the disclosure of information protected by the attorney-client privilege and attorney work-product doctrine.” Defendants’ Itemized Statement contains detailed narratives of the work which they performed and the legal strategies which they employed. These communications between counsel and their clients are privileged and Defendants do not wish to waive the

1 privilege. As the above-referenced local rule recognizes, a party's ability to seek
2 attorneys' fees and costs should not be premised or contingent upon a waiver of the
3 privilege. Accordingly, Defendants respectfully submit that they should be permitted to
4 file their Itemized Statement and Fee Agreement under seal.

5 RESPECTFULLY SUBMITTED this 15th day of November 2017.

6 FISHER & PHILLIPS LLP

7 By s/ Shayna H. Balch

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CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrant(s):

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